

Comment Set C



CITY OF DALY CITY

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August 15, 2003

Ms. Billie Blanchard
CPUC Project Manager
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104

Re: Jefferson-Martin 230 kV Transmission Line Project (A-02-09-043)
• Comments on Draft Environmental Impact Report

Dear Ms. Blanchard:

Thank you for taking the time to further explain the proposed project to me at the recent Public Participation Hearing in San Bruno. Daly City submits its comments to the Draft EIR, and requests reconsideration of a rejected alternative proposed earlier in this process, as well as consideration for study of the collateral matters included within the comments below.

(A) The City restates its request to study collocation along Daly City's boundary at Guadalupe Canyon Parkway. The City's request for consideration was the alternative described as the *San Bruno Mountain Collocation Alternative* (DEIR, vol II §4.3.10). This alternative was eliminated with the environmental consultants finding no relationship between the Proposed Project and the existing overhead lines the City is asking be studied for collocation. The DIER finding includes supporting references to summary considerations in DEIR §4.2.3 (and referenced again to §4.2.2): "As stated in Section 4.2.2 above, any alternative that would entail placing the 230kV line underground along the *current alignment of the existing 60kV* line may properly consider co-locating the 60kV line in such an underground alignment." [emphasis added]

Although the existing Jefferson-Martin 60kV line and the proposed Jefferson-Martin 230kV line diverge in all Project alternatives somewhere south of San Bruno, the PG&E proposed Northern Alternatives all travel within Guadalupe Canyon Parkway to the Martin Substation--- the proposed 230kV line reunites with the existing Jefferson-Martin 60kV line and travels easterly from the intersection of Guadalupe Canyon Parkway and Carter Street. Similar to less urbanized areas of this Project, where collocation of the 60kV and 230kV may be considered and studied; Daly City respectfully requests Guadalupe Canyon component be studied for collocation as well.

(B) Habitat (HCP) Concerns. The DEIR identifies competing environmental concerns over the alternative proposed by Daly City suggesting that an alternative that disrupts the existing overhead transmission lines within HCP covered lands would result in habitat degradation.

C-1

C-2

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The existing power transmission towers need periodic maintenance with mechanical access, and they singularly constitute a limited flight barrier to endangered species. Study of these balanced concerns could possibly indicate if transmission tower removal would constitute an overall benefit, detriment, or neutral impact over HCP lands. Absent some evaluation of this proposal, the prospect would remain unknown and unavailable for CPUC consideration.

C-2

(C) Daly City recently received the initial study for the *San Mateo-Martin #4 Conversion Project* proposing to upgrade the existing San Mateo-Martin 60kV transmission line to 115kV. On San Bruno Mountain, this existing overhead transmission line parallels the Jefferson-Martin 60kV from Guadalupe Canyon Parkway through the Linda Vista Subdivision into the Martin Substation.

C-3

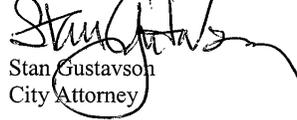
As with the Jefferson-Martin upgrade, the City supports the *San Mateo-Martin #4 Conversion Project's* objectives; however the cumulative effect of both proposed transmission line projects along with evaluation of any potential health and safety risks associated with high voltage lines conjoining, intersecting, overhead and terminating in an urban residential community seems warranted (the San Mateo-Martin Project is proposed for a mitigated negative declaration).

Finally, as to both projects, the City's proposed route for consideration into the Martin Substation could either be within the existing lands owned in fee by PG&E to the east of the existing overhead easements, or collocated within Linda Vista Drive, a public street that terminates at the Martin Substation but can be approached from Guadalupe Canyon Parkway at several (perhaps 6) points approximately equal in distance from either roadway without crossing any residentially owned property.

C-4

Again, the City supports each upgrade project: however the residential neighborhoods of Linda Vista, Original Bayshore, and Midway Village are closely bounded by Guadalupe Canyon Parkway and the Martin Substation on the north, south and east, and bisected by the Jefferson-Martin and San Mateo-Martin overhead transmission lines. More comprehensive project evaluation in this congested residential/utility community can only relieve long standing neighborhood concerns no matter which final alternative the CPUC decidedly chooses.

Respectfully submitted,



Stan Gustavson
City Attorney

cc: Addressee via e-mail: bcf@cpuc.ca.gov; jeffmartin@aspeneq.com
Nicholas Procos, CPUC via e-mail: sf@eipassociates.com
Administrative Law Judge Charlotte TerKeurst
Commissioner Loretta M. Lynch

Responses to Comment Set C – City of Daly City

- C-1 The City of Daly City requests that its San Bruno Mountain Collocation Alternative be studied. This alternative was evaluated in the EIR (Appendix 1, Section 4.3.10) and was eliminated because it would involve undergrounding the proposed 230 kV line and relocating the existing overhead 60 kV line to underground, even though the project objectives could be met with no changes to the 60 kV line in this area. A new section has been added to EIR Appendix 1 (Section 2.3.2.1) to clarify the legal issues related to alternatives. The conclusion presented in the Draft EIR has not changed.
- C-2 Please see Response to Comment C-1. The habitat impacts were secondary in the reasons for elimination of the suggested alternative, because it was determined that this alternative could not legally be pursued under CEQA. While there may be biological benefits to elimination of the existing towers, the removal of those towers should be pursued in a separate action under the HCP or with PG&E, because the impacts related to existing towers have no relationship to the proposed Jefferson-Martin project being evaluated in this EIR.
- C-3 PG&E San Mateo-Martin #4 Conversion Project has been added to the list of cumulative projects in Table F-1 that were considered as part of the cumulative environmental analysis. The current alignment of the Jefferson-Martin Project in Guadalupe Canyon Parkway to Bayshore Boulevard is approximately 500 feet from the residences on Linda Vista Drive (refer to Figure B-3v). Table 2, Jefferson-Martin 230 kV Transmission Project – 230 kV Underground Transmission Lines, in Appendix 3A only lists EMF readings to a distance of 200 feet from the centerline, but at distances greater than 65 feet the readings are less than 1 mG and at 200 feet the EMF levels of the 230 kV underground transmission line would be 0.1 mG. Therefore, based on these distances and readings, the Jefferson-Martin Project, even in conjunction with the proposed San Mateo-Martin #4 Conversion Project, would result in minimal EMF levels to residents in the Linda Vista Subdivision.
- C-4 Please see Response to Comment C-1. In this comment, the City of Daly City also addresses the value of comprehensive project evaluation. The CPUC agrees and notes that this is precisely the function of the Draft EIR in compliance with CEQA and the *CEQA Guidelines*: to provide comprehensive information to the public and decision makers on the potential environmental impacts of a project so that the final decision is a fully informed one.

Comment Set D



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August 15, 2003

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RE: COMMENT ON DRAFT EIR FOR THE PROPOSED JEFFERSON-MARTIN 230 kV TRANSMISSION LINE PROJECT

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) prepared for the proposed Jefferson Martin 230 kV transmission line project. A portion of the project runs through the City of Burlingame, and the following comments relate to the project components which have the potential to impact Burlingame's residents and public facilities.

Of the three alternatives presented, the City of Burlingame supports the Partial Underground Alternative, one of the two environmentally superior alternatives presented in the Draft EIR because it significantly reduces the primary impacts of concern to Burlingame.

While the proposed alternative "Underground Route Option 1B", which would place the entire line underground, would eliminate the visual impacts of the proposed project as it passes through Burlingame by placing the new line underground, it does not adequately reduce the potential impact from EMFs as they relate to the residential properties in Burlingame which are located directly adjacent to the proposed transmission line. It also proposes to keep the existing 60 kV line at its current location, which is as close as 25 feet to residential properties.

Partial Underground Alternative: The environmentally superior alternative, the "Partial Underground Alternative" is the preferred alternative for Burlingame. This alternative would have overhead lines in the section adjacent to Burlingame, but they would be relocated to the west side of Interstate 280 along with the existing 60 kV line. This would substantially reduce impacts of the project and improve the existing conditions as it passes next to Burlingame because all the lines would be located about one-fourth of a mile from the residential properties which would alleviate both the potential impact from EMFs and the visual impacts. Because this alternative would be less costly and reduces the impacts on Burlingame to the greatest extent, it is Burlingame's preferred alternative. It is our understanding that in this alternative, the 60 kV line which now runs adjacent to Burlingame would be relocated to the new towers across I-280 and the existing towers would be removed as a part of this alternative.

D-1

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We understand that the partial underground alternative has adverse visual impacts in the City of San Bruno. We support the City of San Bruno in their request to work with PG&E to address the visual impacts at the point where it transitions to below grade in the City of San Bruno.

D-1

Following are specific issues which should be addressed and/or clarified in the Final EIR.

- **D.2 Land Use:** The land use chapter of the EIR discusses the relationship of this project to various land use planning documents, including the San Mateo County General Plan and the General Plans of some of the cities through which the proposed project will pass. A discussion of the relevant section of the Burlingame General Plan should also be included. The Scenic Roads and Highways Element designates Skyline Boulevard, as well as Trousdale and El Camino Real, as local scenic connectors as they pass through Burlingame. The portion of Skyline Boulevard between Crystal Springs Road and Canyon Road in Burlingame is designated as a County Scenic Road by the County of San Mateo. The project would be visible from Skyline as it passes adjacent to Burlingame. The impacts of the project on this scenic road should be evaluated. One of the Implementation Measures in the Scenic Roads and Highways Element of the Burlingame General Plan states that utility lines along scenic routes should be undergrounded wherever possible; and sensitively sited where placement must be above ground.
- **D.3 Visual Resources:** The visual analysis of the project includes a series of 18 key viewpoints along the project route. Key Viewpoint 13, near Burlingame, looks at the proposed towers from northbound I-280. There is no analysis of view impacts from the residential properties in Burlingame which are within 80 to 100 feet of the centerline of the towers. This a significant impact which should be evaluated in the EIR.

D-2

Mitigation Measure V-13a addresses the impact on views from I-280 and proposes to reduce the number of towers along this section of the route. Two towers would be eliminated in the area adjacent to Burlingame residences. However, the remaining towers in this area would have to be taller to span the increased distance, and would therefore have a greater view impact on these residential properties.

D-3

In addition, the EIR proposes Mitigation Measure V-15a to reduce the impact on views from I-280. This mitigation measure proposes to relocate a tower currently proposed within the SF PUC Watershed lands on the west side of I-280 to a location between 280 and Skyline Boulevard. This property is owned by the City of Burlingame, and the relocation proposed by this mitigation measure is not acceptable to the City of Burlingame for the following reasons:

D-4

- It will place the new tower closer to residential properties in Burlingame adjacent to Skyline Boulevard near Rivera Drive, with potential EMF and view impacts; and

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- This site has been identified as a potential location for a needed water storage tank as identified in the City's 2000 Urban Water Management Plan adopted pursuant to Water Code sections 10620 and following. D-4

- **D.8 Public Health – Electric and Magnetic Fields.** In looking at impacts from Electric and Magnetic Fields (EMFs), the document notes that impacts from electric fields are reduced because these fields are blocked by objects such as trees and buildings. However, the magnetic fields emitted from the 230 kV line are not blocked by objects and there would be a significant increase in exposure to magnetic fields in residential areas along Loma Vista and Skyview Drive in Burlingame (from 5 milliGauss (mG) to 15 mG at 50 feet from the centerline of right-of-way on the east side). While the EIR suggests that EMF exposure has been classified only as a possible carcinogen, every effort should be made to reduce exposure because there is still ongoing study on this subject and it is still considered a possible risk. D-5
 - **Project as Proposed:** With the project as proposed, the proposed towers (centerline) would be within 50 to 100 feet of the residential properties on Loma Vista and Skyview Drive). The Table D.8-1.c in the Draft EIR indicates that at that distance, exposure levels would be between 10 and 15 milliGauss (mG). [However, there is some indication that these may actually range from 15 to 51 mG at these distances]. Some studies done with average magnetic fields of 3 to 4 mG led scientists to classify magnetic fields as a possible carcinogen. Although there are no standards established, due to the potential risk, this impact should be taken into consideration.
 - **Underground Route Option 1-B:** The EIR did not study the EMF impacts of this alternative. However, it can be assumed that the analysis of the underground portions of the project as proposed would apply to this alternative. Figure D.8-2 shows that there is a significant reduction in EMF exposure, except directly adjacent to the line, and exposure levels at sidewalks, assuming a 20-foot distance from the center of the line, would be about 9 mG. While this represents a reduction from the proposed project, it is still of great concern. Route Option 1-B would include underground lines along Skyline Drive, Trousdale Drive and El Camino Real in Burlingame. The right-of-way along Trousdale Drive is 84 feet wide, including sidewalks, and the right-of-way along Skyline Boulevard is a minimum of 80 feet wide. However, residential uses such as yards and play areas are within the right-of-way and much closer to the centerline of Skyline Boulevard, and homes and accessory uses are close to the edge of the right-of-way. These underground lines would pass directly in front of a public school that is in use all year, and near another public school and a major Peninsula hospital. D-6
 - **Partial Underground Alternative:** This alternative offers the best option for Burlingame because the line adjacent to Burlingame would be located across Freeway D-7

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280 from the affected residences. This would place them at a distance of about one quarter mile from these residential properties, rather than just a few feet.

D-7

Additional Requirements for Underground Route Option 1-B. In addition, it should be noted that if the Underground Route Option 1-B is pursued further, the City of Burlingame will require the following:

D-8

- All referenced and available scientific data regarding EMF emissions be provided to the City of Burlingame for City and public review.
- Encroachment permits are required from the City of Burlingame for the work to be conducted within the public right-of-way. A construction traffic control plan shall be submitted for review and approval by the Public Works Department to ensure that traffic impacts are kept to a minimum.
- Cathodic protection shall be provided for any metal utility pipes adjacent to the transmission line within the public right-of-way; as an alternative, any metal pipes may be replaced with plastic pipes.
- All necessary protection measures should be taken to make sure that there is no interference with traffic signal controls along Trousdale Drive and El Camino Real.
- Construction of the project should be coordinated with the proposed reconstruction of Peninsula Hospital to coordinate utility installation and reduce construction-related impacts.

Additional Considerations. It is suggested that site and utility security should also be considered in determining which alternative is pursued.

D-9

Preferred Alternative. If a 230 kV line is to be constructed on the Jefferson-Martin route, the City of Burlingame strongly urges the adoption of the Partial Underground Alternative for the reasons described above.

Please send us a copy of the Final EIR when it is completed. If you have any questions, please call Maureen Brooks, Senior Planner at (650) 558-7253.

Sincerely,



Michael Coffey
Mayor

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**RE: COMMENT ON DRAFT EIR FOR THE PROPOSED JEFFERSON-MARTIN 230 Kv
TRANSMISSION LINE PROJECT**

After hearing from City residents living in the Trousdale Avenue area, the City of Burlingame would like to submit additional comments on the Draft Environmental Impact Report (EIR) for the proposed Jefferson-Martin 230 kV transmission line project. The Burlingame only supports the **Partial Underground Alternative** and has serious concerns about the alternative Underground Route Option 1-B, which would place the entire line underground, and would be placed in the Skyline, Trousdale and El Camino Real right-of-way as it passes through Burlingame. Neighborhood residents in the vicinity of the proposed Trousdale lines have submitted the enclosed petition with 254 signatures because they are concerned with the Electric and Magnetic Fields (EMFs) which would be emitted from the underground lines proximate to many single family residences, schools and the Peninsula Hospital located along the proposed Option 1-B route. The specific concerns expressed by the Trousdale neighborhood which should be addressed in the EIR and considered when choosing an alternative are listed below.

- The EIR notes that Magnetic Fields emitting from the transmission lines are not blocked by being placed underground. The EIR did not study the EMF impacts of the Trousdale underground alternative. The emissions at sidewalks within 20 feet of the line would be at levels of about 9 mG. Studies with magnetic fields of 3 to 4 milliGauss (mG) have led scientists to classify magnetic fields as a possible carcinogen. Although there are no standards established for exposure, this potentially significant impact should be taken into consideration when deciding which option to pursue.
- The issue of EMF impacts along Skyline and Trousdale are of particular concern because there are residences, schools and a hospital directly adjacent to the proposed route of the line. There are a significant number of sensitive receptors, i.e. children, hospital patients, and residents with pacemakers, who will be exposed to the EMFs emitted from the line under this option.
- Residents of Burlingame walk down Trousdale Drive with their children to access Franklin Grammar School, Burlingame Intermediate School and Mills High School and would be exposed to the magnetic fields generated by the underground lines.

D-10

D-11

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- Since objects do not block the magnetic fields, automobile and bus traffic would also be exposed to the magnetic fields.
- There is an alternative, the **Partial Underground Alternative**, which moves the line through Burlingame away from the residential areas and the sensitive receptors. This is the preferred alternative for the City of Burlingame.

It is important that the EIR adequately address these potential impacts on residents in the Trousdale area and also that decision makers consider the concerns of the citizens of Burlingame when making a decision on which alternative is pursued. As the Mayor of Burlingame I want to implore PG&E and the CPUC to select the Partial Underground Alternative. It is our understanding from conversations and correspondence with the City of San Bruno that the option can easily be modified to address their concerns about where and how to accomplish the undergrounding transition. Once that is addressed we believe that you will have an option that has the least health risks for all property owners along the route, is less expensive for the ratepayers and for PG&E.

Please forward a copy of the Final EIR to the Burlingame Planning Department when it is completed and notify the City of any future public hearings on the project.

Sincerely,



Michael J. Coffey
Mayor

D-11

Responses to Comment Set D – City of Burlingame

D-1 The City of Burlingame’s support of the Partial Underground Alternative is noted. It is also noted that in later correspondence (see Comment Set R, County of San Mateo), the City of Burlingame joined the Cities of Millbrae and San Bruno in support of a compromise that would be a hybrid of the Partial Underground Alternative and the Sneath Lane Transition Station Alternative, with Sneath Lane Underground route.

To clarify one issue in the City’s comment, the Partial Underground Alternative does not have adverse visual impacts in the City of San Bruno; the referenced impacts would result from the proposed transition station. The Draft EIR determined that the Sneath Lane Substation would be environmentally preferred over the proposed transition site, but geologic concerns also exist at the Sneath Lane site.

Section D.8.7.4 (Public Health and Safety) of the Draft EIR, page D.8-44 stated, “The EMF field levels illustrated in Figure D.8-2 would be relevant to all underground alternatives: field levels directly over the buried cables would be as high as 70 mG, dropping to about 8 or 9 mG at sidewalks.”

PG&E developed additional EMF information for the portion of Underground Route Option 1B which follows Trousdale Road. The routing for the underground transmission line in Trousdale Avenue places the duct bank approximately 16 feet from the northern sidewalk. The field levels shown in Figure D.8-2 remain valid with a peak of 70 mG and based on the duct bank location the magnetic field at the sidewalk along Trousdale would be 15 mG at the sidewalk. The additional magnetic field modeling also provides a high level of detail regarding contour mapping for magnetic field levels at 1, 2, 5 and 10 mG.

A further review of the magnetic fields in the area between the existing 60 kV lines and the 230 kV underground along Skyline Boulevard has also been performed. A discussion of the magnetic field levels for each segment of Underground Route Option 1B has been included in Section D.8.7.4 and in Figure D.8-2a and Table 8-16a.

D-2 As noted in the introduction to Section D.2.2.2, Local Regulations, the overhead portion of the Proposed Project would pass adjacent to but not into the jurisdiction of the City of Burlingame. Because of this, a discussion on the Burlingame General Plan was not included for the Proposed Project in the Draft EIR. The City’s designation of scenic routes is more pertinent to the PG&E Underground Route Option 1B Alternative, and is addressed below.

As noted in the comment, San Mateo County designates Skyline Boulevard as a scenic route, along with Cañada Road, Junipero Serra Freeway (I-280) north of San Bruno, Edgewood Road, Westborough Boulevard, and Guadalupe Canyon Parkway. Skyline Boulevard (State Route 35) from SR 92 to Santa Clara County and I-280 from Millbrae to Santa Clara County are also State-designated Scenic Routes. San Mateo County does not actually have jurisdiction over the designated stretch of Westborough Boulevard, which extends from Skyline Boulevard to I-280; this stretch of roadway lies within the City of South San Francisco. In any event, the Junipero Serra Boulevard Alternative, which would follow this roadway, would be underground and would not result in adverse effects on this scenic route. Similarly, Guadalupe Canyon Parkway, which does lie within the County’s jurisdiction, would be unaffected by an underground transmission line.

With respect to potential adverse impacts on other County-designated scenic roads, San Mateo County Visual Quality Policy 4.21 calls for the protection and enhancement of scenic corridors by managing the location and appearance of structural development. The County defines a scenic corridor as land adjacent to a scenic road right-of-way which, when seen from the road, provides outstanding views of natural landscapes and attractive man-made development. The visual impact analysis presented in Section D.3 of the Draft EIR provided the basis for assessing the consistency of the Proposed Project and/or alternatives with this policy and other County policies pertaining to visual quality. As described in the discussion for Impact L-3 (Conflict with County Visual Quality Policies) on page D.2-29, the Proposed Project would be in conflict with Policy 4.21 and other County visual quality policies. That discussion notes that implementation of all of the proposed Visual Resources mitigation measures, set forth in Section D.3, would ensure that visual impacts would be reduced to the extent feasible, but significant visual impacts of the Proposed Project would remain in some areas. Implementation of some of the alternatives evaluated in the EIR would eliminate those impacts.

Regarding the City of Burlingame's designation of scenic routes, the Underground Route Option 1B Alternative would follow Trousdale Drive and a portion of El Camino Real, both designated as Local Scenic Routes by the City's General Plan. The Action/Implementation Guideline contained in the City's Scenic Roads and Highways Element of the General Plan and cited in the comment was the only City policy identified as relevant to the PG&E Underground Route Option 1B Alternative. Guideline SR(7) reads: "Utility lines should be undergrounded wherever possible; and sensitively sited where placement must be aboveground." The alternative that would cross through Burlingame's jurisdiction would be entirely underground, and would therefore be consistent with City policy pertaining to scenic routes.

Visual Resources Section D.3.1 has been amended to acknowledge the County and local status of Skyline Boulevard, Trousdale Drive, and El Camino Real. That portion of Skyline Boulevard in the City of Hillsborough will experience significant visual impacts of the Proposed Project from Towers 7/39, 7/40, 8/49, 8/50 and 9/54. However, proposed mitigation measures would eliminate several towers, (7/40, 7/42, 7/45, and 8/47), thereby substantially offsetting visual impacts along this portion of the route. In the case of the Tower 7/40 elimination, impacts would be reduced to less than significant levels. However, the elimination of three towers along this portion of the route would require longer conductor spans (of about 1,250 feet), which may in turn require taller towers. Due to the height and bulk of the remaining towers, the visual impact, though reduced, would remain significant. In addition, Mitigation Measures V-10a and V-12a have been modified to include the specific steps that should be taken when eliminating towers or attempting to reduce tower visibility. These steps are recommended in the event that tower eliminations cannot be accomplished as described for applicable locations for Impacts V-10 and V-12 without exceeding a 30% height increase limitation.

Within the City of Burlingame, the Proposed Project (Towers 10/63 through 10/68) is separated from Skyline Boulevard by residential development along Skyview Drive and Loma Vista Drive, as well as trees and vegetation within the residential development and along Skyline Boulevard. The very limited visibility of the project would not result in significant visual impacts on views from Skyline Boulevard. However, there would be significant impacts from Skyview and Loma Vista Drives, from which the towers would be more visible. Mitigation Measure V-13a recommends the elimination of Towers 10/64 and 10/66 along this route segment to reduce the visual impacts to the above referenced residential areas. If final

engineering deems it necessary, Tower 10/67 would be shifted south by approximately half of the distance to the eliminated Tower 10/66 to reduce the length of the span and allow for height reduction. However, as noted in the discussion of Impact V-13 (Draft EIR page D.3-96), the impact would remain significant even with implementation of this measure.

- D-3 The discussion of Impact V-13: Carolands Substation to Transition Station (page D.3-95) addresses the visual impact to the residences in Burlingame and references the impact analysis for Key Viewpoint 8 as being representative of the circumstances in Burlingame. Mitigation Measure V-13a (Elimination of Towers 10/64 and 10/66; Draft EIR page D.3-96) is intended to reduce the visual impact to the residences in Burlingame without creating additional impacts from views on the I-280 freeway. This discussion also acknowledges that while the impact would be reduced, it would still be significant because the remaining towers would be even taller than the proposed new towers, and the views from residences would be significantly affected. If final engineering deems it necessary, Tower 10/67 would be shifted south by approximately half of the distance to the eliminated Tower 10/66 to reduce the length of the span and allow for height reduction.
- D-4 Note that this tower relocation mitigation measure would apply only if the Proposed Project were approved (it would not apply to the Partial Underground Alternative or to the Route Option 1B Alternative). The tower would be sufficiently far from residences so that magnetic field levels would be very low. The proposed tower location addressed in Mitigation Measure V-15a would have very limited visibility from residences or Skyline Boulevard and would not result in new significant visual impacts. Mitigation Measure V-15a has been modified to include that if the Proposed Project is approved, Towers 10/63 to 11/70 shall be relocated to the west of the I-280 Freeway as illustrated in Figure Ap.1-3b (Partial Underground Alternative, Detail of West of I-280 Segment).
- D-5 General Response GR-1 provides a brief overview of the approach used to assess studies related to EMF health impacts and summarizes the information included in the Draft EIR related to the levels of EMF exposure. For the properties on Loma Vista and Skyview Drive that are 50 to 100 feet from the Proposed Project, the magnetic field levels are shown in Figure D.8-1c in the Draft EIR and vary between 15 mG at 50 feet to 7 mG at 100 feet. A new illustration is provided in this Final EIR to demonstrate the magnetic fields in the area between the Route Option 1B underground route and the existing overhead 60 kV corridor (see Figure D.8-2a). No reference has been found in the Draft EIR that indicates that these fields for the Proposed Project can range up to 51 mG at the specified distances.
- D-6 A further review of the magnetic fields that would be associated with the use of Route Option 1B has been performed and a discussion of the magnetic field levels for each segment of this route option has been included in Section D.8.7.4 and in Figure D.8-2a and Table 8-16a.
- Additional EMF modeling in the vicinity of the school buildings on Trousdale Road, based on the underground line being located 16 feet from the north edge of Trousdale Road, indicates the magnetic field at the closest building corner would be 0.5 mG.
- D-7 The City's support of the Partial Underground Alternative through Burlingame is acknowledged.
- D-8 Please see Response to Comment D-6, above, regarding EMF emissions.

A modification to the first paragraph of Transportation and Traffic Section D.12.2, Applicable Regulations, Plans, and Standards, has been incorporated into this Final EIR to acknowledge that encroachment permits would be required from the City of Burlingame for all work within the public ROW.

Mitigation Measure T-1a, presented in the EIR Transportation and Traffic section, requires PG&E to submit Traffic Management Plans (TMPs) to all agencies with jurisdiction of public roads that would be affected by overhead and underground construction activities for review and approval as part of the required traffic encroachment permits to ensure that traffic impacts are kept to a minimum.

Text has been added to the Impact U-1 (Utility System Disruption) discussion in Section D.14.3.5 that addresses the potential for the proposed underground transmission line to increase corrosion on existing steel pipelines, which could lead to long term accidental system disruption of such pipelines. In addition, Mitigation Measure U-1c (Utilities Protection Against Corrosion) has been incorporated into this Final EIR that requires PG&E to evaluate the potential for the underground transmission line to increase corrosion on existing pipelines and if potential is determined to exist, the measure makes PG&E responsible for installation of the required cathodic protection systems that would eliminate the risk of corrosion.

Construction activities that would take place within the public ROW of Trousdale Drive and El Camino Real would require encroachment permits to be issued by the City of San Bruno and the California Department of Transportation (Caltrans), respectively. Permit stipulations for project construction activities, such as protection measures to ensure that there is no interference with traffic signal controls along Trousdale Drive and El Camino Real, would be part of the encroachment permit requirements if deemed appropriate by the permitting agency.

Pursuant to public services and utilities Mitigation Measure U-1b (Protection of Underground Utilities), prior to the commencement of construction, PG&E must provide the appropriate jurisdictions the opportunity to review and approve the finalized transmission line alignment, including construction plans designed to protect existing utilities. The CPUC recommends that the appropriate parties coordinate construction activities associated with the Proposed Project and the proposed reconstruction of the Peninsula Hospital to reduce construction-related impacts. However, it is up to PG&E and the City of Burlingame to coordinate the design and installation schedules of the respective projects.

- D-9 Site security is not within the scope of this environmental analysis and is not required to be analyzed by CEQA, but it could be considered by the CPUC in its decisionmaking process.
- D-10 The City's opposition to the PG&E Route Option 1B Alternative is acknowledged.
- D-11 Please see Responses to Comments D-1, D-5, and General Response GR-1 regarding EMF.

Comment Set E



URLINGAME CHOOL DISTRICT

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8/27/03

Billie Blanchard, CPUC
C/O Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Mr. Blanchard,

I am writing on behalf of the Board of Trustees of the Burlingame School District. Last evening at the Burlingame School Board meeting the Board voted to oppose Option 1B and support the City of Burlingame in proposing the "Partial Underground Alternative" with no underground lines running underneath Trousdale Boulevard. The reason the Board took this action is their concern for the lines running past the Franklin Elementary School and is in close proximity to Burlingame Intermediate School.

We would like to thank you in advance for your consideration of our objection and strongly suggest the opposition to Option 1B and support the City of Burlingame in proposing the "Partial Underground Alternative" with no underground lines running underneath Trousdale Boulevard.

Sincerely,

Dr. Sonny H. Da Marto
Superintendent of Burlingame School District

E-1

Responses to Comment Set E – Burlingame School District

- E-1 The commenter’s support of the Partial Underground Alternative is noted. Please refer to Responses to Comments D-1, D-6, and General Response GR-1 for a discussion of EMF health and safety and alternatives through the City of Burlingame.

When and if the CPUC approves the Proposed Project or an alternative route, PG&E would revise its EMF Field Management Plan to specifically address the sensitive land uses along the approved route. The EMF mitigation now proposed by PG&E for schools along the proposed route (deeper burial of the underground cables) would be applied to the schools along the approved route, based on PG&E’s land use priorities as identified in EIR Section D.8.7.4, under heading “PG&E’s Proposed EMF Mitigation.”

Comment Set F

Aug-28-2003 05:09pm From-SEN. JACKIE SPEIER

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California State Senate

SENATOR JACKIE SPEIER

REPRESENTING SAN FRANCISCO AND SAN MATEO COUNTIES



COMMITTEES
CHAIR
Insurance
Select Committee on Government Oversight
MEMBER
Appropriations
Energy, Utilities and Communications
Transportation
Joint Committee on Legislative Audit
Select Committee on Bay Area Transportation

August 25, 2003

Billie Blanchard, CPUC
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear California Public Utilities Commission:

I strongly urge the CPUC to consider the safest possible alternative regarding the proposed Jefferson-Martin 230kV transmission line project. Ideally, I would like to see a route that does not impact the health of the residents.

After reviewing the draft environmental impact report it is apparent that PG&E's route 1A is unacceptable. While the scientific data is incomplete, there has been significant scientific study regarding the effect of long term exposure to EMFs that suggest there could be serious health risks associated. Further, property values and aesthetics are negatively impacted.

Ideally, I would like to see a route chosen that under grounds the new lines, placed at least 150 feet away from any residence. In the event that the lines are above ground they should be at least 350 feet away from any residence.

The CPUC has the unique opportunity to do a public service by choosing the safest alternative with the least impact on the existing communities. A decision that considers the health and safety of the residents must be of paramount importance.

All the best


JACKIE SPEIER
State Senator
8th District

KJS:bb

F-1

F-2

Responses to Comment Set F – Senator Jackie Speier

- F-1 The Senator's opposition to the Proposed Project (PG&E's Route 1A) and support for a route that does not impact the health of residents is acknowledged. The Southern Segment routes that are most consistent with this request are the Route Option 1B Alternative from Jefferson Substation to Hayne Road, and the Partial Underground Alternative from Hayne Road north to the San Bruno transition station.
- F-2 Please see General Response GR-1 regarding EMF issues and General Response GR-2 on property values. Section D.8.7.4 presents estimated magnetic field measurements for the Proposed Project, and it has been expanded to add specific magnetic field information for the Partial Underground Alternative and the Route Option 1B Alternative. These alternatives would result in lower magnetic field values at residences than those created by the Proposed Project.

The Senator requests that underground lines be placed at least 150 feet from any residence and overhead lines be at least 350 feet from any residence. The magnetic field for the 230 kV underground transmission line for the Proposed Project would be 0.2 mG at a distance of 150 feet from the line and the magnetic field for the 230 and 60 kV overhead transmission lines for the Proposed Project would be 0.8 mG at a distance of 350 feet east of the lines.

Along the southern overhead segment of the Proposed Project, the distance from the Proposed Project to the closest property lines along the west side of Lexington Avenue between Towers 5/28 to 5/32 range from 62 feet by Tower 5/30 to 147 feet by Tower 5/31. Near Hillsdale Junction, just south of the crossing of San Mateo Creek, the line is approximately 80 feet from residential property lines at Towers 6/36 and 6/37. North of the San Mateo Creek crossing and west of the Town of Hillsborough, existing Tower 7/39 is within the fenced yard of a residence, Tower 7/44 is 7 feet west of a residential fence line, and the towers and span between Towers 8/51 and 8/52 are adjacent to and/or within property lines. The remainder of the property lines of residences in the Town of Hillsborough along Black Mountain Road would be at distances greater than 100 feet. At/within property lines, magnetic field levels would be 23 to 32 mG, dropping to 4 to 6 mG at 60 to 80 feet away and 1.5 mG at 150 feet.

In the northern segment of the Proposed Project, the route would travel underground in roadways through residential areas, along Hoffman and Orange Streets, in the City of Daly City. Based on PG&E's proposed line locations within the roadways, the closest edge of the residential property lines along Hoffman and Orange Streets would be 19 feet. Magnetic field levels at 19 feet would be about 9 mG.

Existing requirements regarding distance from transmission lines includes:

- As indicated in the Draft EIR (page D.8-37), a number of counties, states, and local governments have adopted or considered regulations or policies related to EMF exposure. The reasons for these actions have been varied; in general, however, the actions can be attributed to addressing public reaction to, and perception of, EMF as opposed to responding to the findings of any specific scientific research or health risk. International guidelines and the regulations adopted in other states are all well above the magnetic field values stated above at 150 feet and 350 feet with the lowest regulated value being Florida's requirement that magnetic field from 230 kV lines not exceed 150 mG at the edge of the right-of-way.

- The California State Department of Education has enacted requirements for school site selection and approval, which are specified in the California Code of Regulations, Title 5, Section 14010. Section 14010 defines minimum distances between a new school and the edge of a power line or transmission line ROW, or the area immediately surrounding a line that utility companies need to access the lines for maintenance and repairs. The setback distances are: 100 feet for 50-133 kV lines; 150 feet for 220-230 kV lines; and 350 feet for 500-550 kV lines. These distances are not based on specific biological evidence, but on the known fact that the strength of electric fields from power and transmission lines drops to near background levels at the specified distances, given that no other major sources are present (DHS, 1999¹).

Also, please see General Response GR-2 regarding property values as related to transmission lines and CEQA analysis. Note that in Visual Resources section D.3.3.3, which provides a discussion of visual impacts of the overhead route segment, a comprehensive set of mitigation measures has been proposed to minimize visual impacts.

¹ DHS (State Department of Health Services). 1999. Short Fact Sheet on EMF. Obtained online (<http://www.dhs.cahwnet.gov/ehib/emf/shortfactsheet.PDF>) on September 16, 2003.

Comment Set G



TOWN OF HILLSBOROUGH

1600 FLORIBUNDA AVENUE
HILLSBOROUGH
CALIFORNIA
94010-6418

DEPARTMENT OF PUBLIC WORKS

August 25, 2003

Billie Blanchard, CPUC
c/o Aspen Environmental Group
233 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: Draft Environmental Impact Report for the Proposed Jefferson-Martin 230 KV Transmission Line Project (Application No. A0209043) (SCH #20030120066)

Dear Ms. Blanchard:

As a representative for the Town of Hillsborough ("Hillsborough"), I hereby submit the following comments regarding the Draft Environmental Impact Report (DEIR) for the proposed Jefferson-Martin 230 KV Transmission Line Project (Application No. A0209043). Hillsborough would also like to take this opportunity to thank you and the others who have worked on the DEIR for your work in preparing this document and the opportunity for Hillsborough to participate in this process.

The Town of Hillsborough is an active party in Application ("A")02-09-043. The Town of Hillsborough filed a protest of PG&E application, filed a prehearing conference statement and participated actively in the January 10, 2003 prehearing conference, filed scoping comments on February 27, 2003, participated actively in the scoping meetings held in March, 2003, and participated actively in the public participation hearing held in San Mateo on August 12, 2003 to discuss the DEIR.

The following comments reflect concerns that Hillsborough and its residents have with the proposed project and address environmental issues that the town believes must be considered in the final Environmental Impact Report. In addition to these comments, Hillsborough fully supports the comments and recommendations on the proposed project being filed by 280 Corridor Concerned Citizens ("280 CCC"), whose membership includes many residents of Hillsborough.

Comment Set G, cont.

Environmental Inequities

The primary purpose of the proposed project is to provide the City and County of San Francisco (“San Francisco”) with more power capacity that will, in turn, allow San Francisco to retire existing in-city generation. The DEIR has not adequately addressed the so-called “Need” for more power generation as PG&E continually asserts. The need has already slipped by a year from 2005 to 2006, and there is no sign that growth is picking up as the most recent load growth studies claim, PG&E load forecasts assume continued growth in San Francisco load that is unrealistic, even before the economic downturn reduced the current load below that assumed by PG&E and slowed future load growth rates. Outdated PG&E load forecasts ignore an actual drop in San Francisco load and vast reduction in the speed of future load growth, and PG&E’s and the ISO’s needs assessments to support transmission projects have proven repeatedly to overstate load and understate the capacity of the existing transmission system. While San Francisco will receive the environmental, health, safety and economic benefits of the proposed project by replacing in-city generation with power that is imported over the proposed project, the people who live and work in communities along the proposed project route will bear all of the adverse environmental, health, safety and economic impacts because this new transmission line will be located in their communities and in some cases, in their front or back yards. This is the case for all of the routes evaluated in the DEIR.

G-1

Hillsborough also feels that the No Project Alternative must consider how the reliability needs of San Francisco would be met without the construction of the Jefferson-Martin Project. There are at least two “No Project” generation alternatives that would dramatically increase the reliability of electric service to San Francisco: (1) Siting the four Williams turbines; and (2) supporting the licensing of the Potrero 7 unit. These generation alternatives are solely within the power of San Francisco to effectuate. It is equally clear that San Francisco is opposed to every single one of these alternatives, and that PG&E shares San Francisco’s goal of reducing the amount of generation in San Francisco and increasing San Francisco’s reliance on the importation of distant generation over transmission lines. It is quite clear that the only constraints are San Francisco’s refusal to permit. The major transmission outage that hit the East Coast and Great Lakes regions of the U.S. and Canada in mid-August exposes the folly of relying too much on transmission facilities to ensure reliability of service. PG&E’s utility neighbor to the south, Southern California Edison Co. agreed with this position fully only two weeks ago when it filed comments with the commission on feasibility of an RFP for determining the desirability of Edison’s Mountainview application (A.03-07-032). Edison basically stated that the recent Northeast blackout dramatically demonstrated the drawbacks of being too dependent on distant power generation. Again, San Francisco’s position of “Not in My Back Yard” for power generation puts the burden of the proposed transmission route directly on Hillsborough and its surrounding neighbors. This is not acceptable to the Town of Hillsborough. We believe that San Francisco has the ability to generate sufficient power generation within the confines of the City & County of San Francisco and should not be allowed to shift that ability with its attendant impacts to Hillsborough or another region.

G-2

Comment Set G, cont.

The DEIR should be modified to acknowledge the inequity of placing new environmental, health, safety and economic burdens solely upon a group of people who will receive no direct benefit from the proposed project and should be revised to include additional mitigation to prevent such an outcome. As discussed below and in the comments submitted by 280 CCC, such mitigation should include collocating the existing 60 KV line with the proposed 230 KV transmission line and locating these lines sufficiently far away from homes, schools, and businesses to minimize the adverse environmental impacts associated with the proposed project.

G-3

Health and Safety Impacts

Hillsborough is very concerned with the increased health risks that are posed by the proposed project and does not believe that the DEIR adequately addresses this issue. Specifically, the DEIR does not address Electromagnetic Field (“EMF”) levels associated with the proposed project or the impact of EMF levels in any substantive way. The majority of medical and scientific studies published in the peer reviewed medical literature indicate that children living near high voltage or high current power lines and workers exposed to power-frequency EMFs on the job, develop cancer at a significantly higher rate than children and workers who are less exposed to EMFs. A June 2002 study by the California Department of Health Services (“DHS”) states that DHS scientists are inclined to believe that EMF’s are associated with an increased risk of childhood leukemia, adult brain cancer, Lou Gehrig disease and miscarriage. The Energy Power Research Institute in Palo Alto (“EPRI”) has found that only 5% of residences in the United States are exposed to EMF levels as high as those that would occur in many homes along the proposed project route. It is estimated by EPRI that children in homes with EMF exposure of 3-4 milligauss are twice as likely to develop childhood leukemia as their non-exposed peers.

G-4

While the DEIR acknowledges EMF’s as potentially dangerous by discussing certain low cost and no-cost mitigation measures, it fails to account for exposure levels that families would constantly face in and around their homes. Moreover, lines and insulators compromised due to age and poor maintenance also contribute to increased EMF levels. Hillsborough believes that PG&E is not currently maintaining the existing double circuit 60 KV line. Evidence of this includes lines that crackle and buzz at a disturbing decibel level, which many residents have complained about. Additionally, according to residents, PG&E has repeatedly failed to respond to requests that PG&E perform routine maintenance on the lines. Hillsborough is concerned that the health and welfare of its residents is being entrusted to a corporation that has already failed to address the residents concerns in this area.

As discussed by Vice Mayor Kasten at the Public Participation Hearings on August 12th in San Mateo, the risks associated with EMFs clearly warrant prudent avoidance to EMF exposure, especially given the fact that residents along the proposed project route will not have the ability to avoid exposure (such as with cigarette smoke, toxic chemicals or exposure to the sun’s harmful rays, where people can purposefully choose not to smoke and can protect themselves from the sun with appropriate sunscreen). No standards

Comment Set G, cont.

currently exist in the U.S. for safe levels of EMF exposure, but Hillsborough agrees with the opinion of several experts that *exposure should be no more than 1 milligauss*. Since the amount of exposure decreases as distance from the transmission line is increased, the further the proposed project is located away from residences the better.

G-4

Adverse Impacts on Property Values

The socioeconomic section of the DEIR does not address the very real impacts the proposed project would have on real estate values in the vicinity of the proposed project. It has been cited by several sources, including many residents, that transmission lines, towers, substations and transition stations are viewed by prospective homebuyers as undesirable neighbors. Many real cases exist around the country where property values have significantly dropped because a property is located in close proximity to these types of installations. Moreover, this adverse impact is not limited only to homes in view of towers and transition stations, but rather it also affects the value of other homes in the general neighborhood of these types of facilities when comparative property values are researched.

G-5

Homes in Hillsborough represent our resident's most valuable financial investment and many residents of Hillsborough and surrounding communities have made significant financial sacrifices to live in the area because they believe that these communities are worth investing in. The proposed project, however, would reduce property values and degrade the character of our communities. For many, even the loss of a few percentage points in property value amounts to a very significant devaluation. Such a devaluation could be devastating to older residents whose main asset is their home. Hillsborough believes that the negative socioeconomic impacts on real estate values are significant for the proposed project in general and devastating for PG&E's preferred route 1A specifically.

Alternatives

As discussed in the comments submitted by 280 CCC, the Watershed Restoration Alternative ("WRA") would meet all of the proposed project alternatives while at the same time minimizing adverse environmental impacts related to the proposed project. Hillsborough fully supports the WRA¹ and believes it must be included as part of the environmental review of the proposed project. While not as environmentally superior as the WRA, the Partial Underground Alternative discussed in the DEIR, with certain modifications to ensure the transmission lines are located a safe distance from homes, is also superior to the All Underground Alternative.

G-6

Conclusion

The proposed project will have a significant adverse impact on the lives of those who live, work and play in the area of the proposed project. Hillsborough believes that these

G-7

¹ A description of the WRA route is included in the comments submitted by 280 CCC.

Comment Set G, cont.

impacts can and should be mitigated beyond what is provided in the DEIR. Accordingly, Hillsborough requests that:

- PG&E preferred Route 1A be unconditionally rejected.
- The DEIR is revised to include the "No Project" Alternative.
- The DEIR be revised to include the Watershed Restoration Alternative discussed in the comments submitted by 280 Corridor Concerned Citizens as the environmentally superior alternative.
- In all cases, the 230 KV line, along with the existing 60 KV line, be located at a distance sufficiently far from homes to result in a milligauss level of one or less (based on future worst-case load forecasts).

The Town of Hillsborough has been a constant and active participant in this process and has attended and spoken at the various meetings that have been held on this application. The Town also wants the CPUC to understand its commitment to the safety and well being of its residents. Again, the Town of Hillsborough thanks you for this opportunity to provide comments on the DEIR and appreciates your careful consideration of this matter.

Respectfully Submitted,

By 

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c.c. City Council
City Manager
City Attorney

G-7

Responses to Comment Set G – Town of Hillsborough

- G-1 The primary purpose of the Proposed Project is not solely to supply the City and County of San Francisco with power, but also to improve electric reliability throughout the entire San Francisco Peninsula. Regarding the impacts and benefits of the project in San Mateo County, please see General Response GR-3.

EIR Section A.2.3 (Summary of Project Purpose and Need) acknowledges that demand forecasts completed after PG&E's Proponent's Environmental Assessment show reduced demand. As described in EIR Section A.2.3, the need for the project will be addressed in the CPUC's hearings as part of its proceeding on the PG&E Application for a Certificate of Public Convenience and Necessity, and is not an issue addressed as a requirement of CEQA.

- G-2 The EIR describes the generation proposal for the CCSF in Sections C.5.5.1 (New Generation Alternatives) and Section C.6 (No Project Alternative). As described in Section C.6.1, the CCSF is actively pursuing installation of the four Williams turbines.

The energy situation in the Bay Area is very different from that in the northeastern U.S., which experienced a major blackout in August 2003. Studies are ongoing to determine the cause of the event, but it does not seem that "relying too much on transmission facilities" was the primary cause (generation facilities also went off-line during the event). Also, the situation in the northeastern U.S. is not necessarily applicable to the Bay Area issues. The Bay Area is critically short of both generation and transmission. The California ISO has determined that the addition of new generation alone would not eliminate the need for the Jefferson-Martin transmission line, and that building the transmission line would not eliminate the need for new generation.

- G-3 Please see Response to Comment G-1 and General Response GR-3. The EIR presents several feasible alternatives that reduce the impacts of the Proposed Project on residences, schools, and businesses. Also, see Responses to Comment Set 40 (280 Corridor Concerned Citizens Group).

- G-4 Please see General Response GR-1 regarding the EIR's consideration of EMF. The two primary parameters that affect the level of magnetic field from electric power lines are the amount of current in the line and the distance from the line. The magnetic field levels of transmission lines will vary depending upon customer power usage and corresponding changes in current. The condition of lines (wires) or insulators does not affect magnetic field levels, so although the Town may have concerns regarding PG&E's maintenance of the line, the level of line maintenance would not affect magnetic fields. In addition, if the insulators on these lines were to fail, the protective relays would turn off the line and no EMFs would be present.

In the absence of specific references of complaints, PG&E could find no record of customer complaints or requests to perform maintenance on these lines. PG&E inspects this line at least twice per year and addresses problems as they are identified.

Audible noise such as a crackle or buzz is not the result of EMF; this is related to a different phenomenon known as Corona Noise, which is addressed in Section D.11.3.3 (in D.11, Noise and Vibration) of the Draft EIR (page D.11-14). The Draft EIR indicates that the highest noise level at the edge of the right-of-way for the Proposed Project would be 46 dBA, which would not be in excess of standards in the local general plans or noise ordinances. Thus corona noise was identified as a less than significant impact (Class III).

- G-5 Section D.13.7 (Property Values) has been added to the Socioeconomics section (D.13) of the EIR. This section addresses issues associated with the potential for impacts on property values and industrial facilities such as transmission lines in an effort to provide the reader with detailed background information based on extensive literature review and the property value issues of past similar projects. It should be noted that this section does not consider property values in the context of CEQA and the determination of environmental impact, because: (1) there is no consistent evidence that industrial facilities negatively impact property values; and (2) there are no defined or adopted CEQA standards for analysis of industrial project impacts on property values. As such, the information in this section is provided for the benefit of the public and decisionmakers. As cited in Section D.13.7.1 and *CEQA Guidelines* Section 15131, economic or social effects of a project *per se* are not considered as significant effects on the environment unless physical effects can be identified. However, such issues can be considered by the CPUC in its General Proceeding. In summary, as shown in detail in Section D.13.7, although there is evidence that transmission lines may have affected property values in some cases, the effects are generally smaller than anticipated, and greater detailed studies on the subject are required to determine a direct correlation between the siting of industrial facilities (such as transmission lines) and property values.
- G-6 The commenter's support for the Watershed Restoration Alternative (WRA) and the Partial Underground Alternative over the Proposed Project (Route Segment 1A) and the Route Option 1B Alternative are acknowledged. For a discussion of the WRA, please refer to in Appendix 1, Alternatives Scoping Report, Section 4.2.8, and the Response to Comment 40-18.
- G-7 In response to each issue in this comment:
- The Town's opposition to the project as proposed by PG&E is acknowledged. The EIR found that both the Partial Underground Alternative and the Route Option 1B would be environmentally preferred over the Proposed Project.
 - The Draft EIR includes an adequate analysis of the No Project Alternative in Section C.6.
 - The Watershed Restoration Alternative is addressed in EIR Appendix 1, Section 4.2.8, but it is not found to be the environmentally superior alternative, nor is it found to meet CEQA's criteria for consideration as an alternative that would be carried forward to full analysis.
 - Please see Response to Comment G-4 regarding EMF impacts.

Comment Set H

August 27, 2003

Billie Blanchard, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: **City of South San Francisco comments on the Draft Environmental Impact Report (DEIR) for the Proposed Jefferson-Martin 230kV Transmission Line Project**

Dear Ms. Blanchard:

The City of South San Francisco appreciates the opportunity to submit these comments on the Jefferson-Martin DEIR. We limit our commentary to routing within the City limits of South San Francisco. In these comments, we offer general observations regarding the desirability of the route delineated in the project description (along the BART line, McLellan Drive, and Lawndale Boulevard) and the undesirability of the putative “Environmentally Superior Alternative” (along Shaw Road, Produce Avenue, Gateway Boulevard, etc.) We offer detailed comments demonstrating serious environmental and practical problems with the “Environmentally Superior Alternative,” demonstrating a lack of analysis of issues raised by that alternative. We also propose a far more environmentally sensitive alternative which might be administratively challenging but would be a clearly “Environmentally Superior Alternative” in virtually all respects.

General comments:

City of South San Francisco staff met with PG&E representatives early in the process on this project. The City reviewed the route defined in the project description (along the BART right-of-way, McLellan Drive, and Lawndale Boulevard (Lawndale Boulevard is physically within the Town of Colma.) This route is acceptable to the City and raises no significant safety or construction issues. The necessary excavation for this route is along recently disturbed construction areas, the construction can take place with minimal disturbance to traffic, few residences are near the construction areas, and there is no reason to expect serious toxic contamination issues along the route.

H-1

City officials were surprised when the DEIR was issued with a new, inadequately analyzed, “Environmentally Superior Alternative” which traverses private properties, City streets, areas of unstable soils, areas known to be subject to flooding, and areas of known toxic contamination. The construction impacts would significantly disrupt surface traffic, create major nuisances in the City’s premier hotel and office areas, breach capped toxic sites, generate potential exposure of sensitive receptors to toxics, and generally be far more disruptive in practical and environmental terms than the primary route in the project description. Dispassionate analysis clearly shows that the putative “Environmentally Superior Alternative” actually generates far more environmental impacts than the project description.

H-2

Comment Set H, cont.

Specific comments:

The City of South San Francisco believes that the designation of the “Environmentally Superior Alternative” is inappropriate and not supported by the facts. The proposed route creates many avoidable impacts not created by the project description. Among them are the following:

Soils along Shaw Road are of poor quality and variable conditions. The line would also parallel the Seventh Avenue sewer line, seriously complicating construction issues. Obviously, businesses on the street would be disrupted by the construction.

H-3

Near the bend in Shaw Road, where it turns west toward San Mateo Avenue, the route would have to cross two sewer force mains. The area is also susceptible to seasonal flooding.

H-4

Leaving Shaw Road, the route enters private property and then must pass under a navigable slough. The bore pit required will seriously disrupt, if not close, the business on the property. The proximity of the property to Highway 101 limits available space for a bore pit. Either the business or Shaw Road likely will need to be closed for an unknown period of time.

H-5

The required bore pit north of the navigable slough will also be on private property, but this area is a large commercial parking lot. Proper planning would minimize disruption here. This is the only part of the route which appears relatively simple to implement.

H-6

At the north end of the property containing the commercial parking lot, the route must pass through either a commercial card-lock fueling facility or move onto the southbound Freeway 101 on-ramp which carries some 16,000 vehicles per day. Contamination issues at the fueling facility are unknown, but the operation of the facility would be disrupted if the route passes through the parcel. Construction on the on-ramp would be extremely disruptive to businesses, employees, and residents of South San Francisco.

H-7

At Terminal Court, the on-ramp becomes Produce Avenue, which is the northern leg of the on-ramp addressed in the preceding paragraph. Construction on this street would obviously be seriously disruptive. Worse, Terminal Court is the sole access to the Golden Gate Produce Terminal, which is the largest produce terminal in the Bay Area. The nature of this facility is that operations cannot be disrupted for even a single day without large-scale effects throughout the Bay Area due to the perishable nature of the products it distributes. Further, there are shallow storm drains in the area, which is also prone to seasonal and high-tide flooding.

H-8

Continuing along Produce Avenue, the route will encounter previously installed sub-grade improvements which will require replacement. Crossing under Colma Creek will probably require closure of Produce Avenue due to the size of the necessary bore pits and will disrupt the southbound Freeway 101 off-ramp to Produce Avenue and South Airport Boulevard. The heavy traffic in this area will be severely disrupted by construction. Crossing under Freeway 101 on South Airport Boulevard, the route will encounter two

H-9

Comment Set H, cont.

sewer force mains. This undercrossing is a major route to businesses east of Freeway 101, and construction will create a major disruption.

H-9

From the freeway undercrossing, the route turns north along Gateway Boulevard. Halfway to East Grand Avenue, railroad tracks must be crossed. A 24-hour major truck fueling facility, restaurant, and other businesses line the street. Fiber optic lines have been installed in this section of Gateway Boulevard.

H-10

After crossing East Grand Avenue, one of the two major access routes to businesses East of 101, Gateway is lined with South San Francisco's premier hotels and office buildings. This area is mischaracterized as "industrial" in the DEIR. Given the past land uses in this area, it is virtually certain that contamination by toxic materials exists under the street. Construction will require characterization of these toxics and use remediation measures of unknown complexity. Fiber optic cables also underlie the street.

H-11

This same segment of Gateway Boulevard also contains an existing, 300 position child care center at 850 Gateway Boulevard. In addition, the City of South San Francisco has just broken ground on a new, 100 position child care center at 559 Gateway, which will be in operation by the time the Jefferson-Martin project begins construction. Child care facilities, of course, house our society's most sensitive receptors. Major mitigation and protective measures will be required to protect these sensitive receptors from exposure to toxics that will be disturbed if this route is constructed.

H-12

Gateway Boulevard stubs into Oyster Point Boulevard at the new terminus of a new, nearly completed flyover off-ramp from southbound Freeway 101 to eastbound Oyster Point Boulevard. This intersection carries some 20,000 vehicles per day, a number which may well increase when the flyover is completed. Once across Oyster Point Boulevard, the route enters the area known as Bay West Cove.

H-13

The proposed route turns west toward Freeway 101 after crossing Oyster Point Boulevard. This area is a classic brownfield, with significant known toxic contamination which has been concentrated and capped. The proposed route will traverse some of the most toxic areas in the City, breaching the cap and excavating with known contaminated areas in the process. The section of Bay West Cove proposed to be traversed by the proposed route is currently undeveloped, but approvals have been granted to construct office and biotech buildings and a 350 room hotel. Construction of these facilities can begin any time the owners feel that conditions warrant. The approvals granted for the Bay West Cove properties are for buildings which minimize disturbance of the cap and the known contamination. This area is generally upwind of the 300 position child care facility at 850 Gateway Boulevard, which, as already noted, contains extremely sensitive receptors. However, the sensitive receptors are not the only receptors; indeed, brownfield remediation is generally conducted with the idea that the toxics, once capped, will remain undisturbed in place. Breaching of the cap may require its restoration to more stringent, contemporary standards.

H-14

Comment Set H, cont.

Still in the Bay West Cove area, the route turns north near the railroad tracks (still in the contaminated soils) and continues along in front of two new hotels. Aside from the toxics issues, there is little room to maneuver. Maintaining access for patrons and for emergency vehicles will be a significant problem, as will protection of hotel patrons from toxics.

H-15

Past the hotels, going north, San Francisco Bay is located almost at the railroad right-of-way. The route in this area is within the jurisdiction of the Bay Conservation and Development Commission, and may have potential to disturb shellmounds and affect threatened or endangered species.

H-16

Continuing north, the route moves into the Sierra Point office park area, which is an old landfill. Excavation in this area will require evaluation of the excavated materials and restoration of the landfill cap and proper protection of office workers from potential toxics.

H-17

From this area, the route passes out of the jurisdiction of South San Francisco.

The route defined in the project description clearly would generate far fewer impacts on the City of South San Francisco. A detailed and objective analysis of the problems created by construction of the "Environmentally Superior Alternative" must lead to the conclusion that the project as originally defined will be far less disruptive to businesses and residents attempting to access employment areas east of 101 and will not generate the host of toxics problems and potential exposure of sensitive receptors sure to arise with the "Environmentally Superior Alternative." All in all, we submit that the "Environmentally Superior Alternative" is in fact no such thing and should be removed from further consideration.

H-18

Proposal for an alternative that actually is Environmentally Superior:

Within South San Francisco, the intuitively and rationally obvious route to pursue is along the railroad tracks. Such a route is short, direct, generally away from residences, and devoid of the serious issues generated by the "Environmentally Sensitive Alternative" and indeed, by the project as generally proposed. We recognize that administrative issues arise in dealing with the Joint Powers Board; however, the other alternatives require dealing with one or more of BART, CalTrans, BCDC, and CalEPA's Department of Toxic Substances Control and Regional Water Quality Control Board. In any case, these are administrative concerns, not environmental ones. The railroad right-of-way should be carefully investigated as a possibility that minimizes environmental impacts of the project.

H-19

Thank you for the opportunity to comment.

Sincerely,

Original signed by Thomas C. Sparks

Thomas C. Sparks, Chief Planner

Comment Set H, cont.



OFFICE OF THE
MAYOR
(650) 877-8500
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September 10, 2003

Billie Blanchard, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: **City of South San Francisco comments on the Draft Environmental Impact Report (DEIR) for the Proposed Jefferson-Martin 230kV Transmission Line Project**

Dear Ms. Blanchard:

The City of South San Francisco appreciates the opportunity to submit these comments on the Jefferson-Martin DEIR. We limit our commentary to routing within the City limits of South San Francisco. In these comments, we offer general observations regarding the desirability of the route delineated in the project description (along the BART line, McLellan Drive, and Lawndale Boulevard) and the undesirability of the putative "Environmentally Superior Alternative" (along Shaw Road, Produce Avenue, Gateway Boulevard, etc.) We offer detailed comments demonstrating serious environmental and practical problems with the "Environmentally Superior Alternative," demonstrating a lack of analysis of issues raised by that alternative. We also propose a far more environmentally sensitive alternative which might be administratively challenging but would be a clearly "Environmentally Superior Alternative" in virtually all respects.

General comments:

City of South San Francisco staff met with PG&E representatives early in the process on this project. The City reviewed the route defined in the project description (along the BART right-of-way, McLellan Drive, and Lawndale Boulevard (Lawndale Boulevard is physically within the Town of Colma.) This route is acceptable to the City and raises no significant safety or construction issues. The necessary excavation for this route is along recently disturbed

H-20

Comment Set H, cont.

construction areas, the construction can take place with minimal disturbance to traffic, few residences are near the construction areas, and there is no reason to expect serious toxic contamination issues along the route.

City officials were surprised when the DEIR was issued with a new, inadequately analyzed, "Environmentally Superior Alternative" which traverses private properties, City streets, areas of unstable soils, areas known to be subject to flooding, and areas of known toxic contamination. The construction impacts would significantly disrupt surface traffic, create major nuisances in the City's premier hotel and office areas, breach capped toxic sites, generate potential exposure of sensitive receptors to toxics, and generally be far more disruptive in practical and environmental terms than the primary route in the project description. The authors of the DEIR seem to assume that merely because the "Environmentally Superior Alternative" is the shorter route that the environmental impacts will be less as compared to the Proposed Project (see for example the statement to that effect on page D.2-50.) As will be shown, dispassionate analysis clearly shows that the putative "Environmentally Superior Alternative" actually generates far more environmental impacts than the project description.

Specific comments:

The City of South San Francisco believes that the designation of the "Environmentally Superior Alternative" is inappropriate and not supported by the facts. The proposed route creates many avoidable impacts not created by the project description. Among them are the following:

Soils along Shaw Road are of poor quality and variable conditions. This area is underlain by bay mud and is slowly subsiding. The line would also parallel the Seventh Avenue sewer line, seriously complicating construction issues. Obviously, businesses on the street would be disrupted by the construction.

Near the bend in Shaw Road, where it turns west toward San Mateo Avenue, the route would have to cross two sewer force mains. The area is also susceptible to seasonal flooding.

Leaving Shaw Road, the route enters private property and then must pass under a navigable slough. The bore pit required will seriously disrupt, if not close, the business on the property. The proximity of the property to Highway 101 limits available space for a bore pit. Either the business or Shaw Road likely will need to be closed for an unknown period of time.

The required bore pit north of the navigable slough will also be on private property, but this area is a large commercial parking lot. Proper planning would minimize disruption here. This is the only part of the route which appears relatively simple to implement.

At the north end of the property containing the commercial parking lot, the route must pass through either a commercial card-lock fueling facility or move onto the southbound Freeway 101 on-ramp which carries some 16,000 vehicles per day. Contamination issues

H-20

Comment Set H, cont.

at the fueling facility are unknown, but the operation of the facility would be disrupted if the route passes through the parcel. Construction on the on-ramp would be extremely disruptive to businesses, employees, and residents of South San Francisco.

H-20

At Terminal Court, the on-ramp becomes Produce Avenue, which is the northern leg of the on-ramp addressed in the preceding paragraph. Construction on this street would obviously be seriously disruptive. Worse, Terminal Court is the sole access to the Golden Gate Produce Terminal, which is the largest produce terminal in the Bay Area. The nature of this facility is that operations cannot be disrupted for even a single day without large-scale effects throughout the Bay Area due to the perishable nature of the products it distributes. Further, there are shallow storm drains in the area, which is also prone to seasonal and high-tide flooding.

The federal Flood Insurance Rate Map shows this area generally as "Zone B," subject to flooding during 100 year storm events. However, due to the obsolescence of the maps, upstream development which leads to increase runoff, ongoing subsidence of bay mud, and occasional combinations of high tides and storms, the area is subject to localized flooding virtually every year.

H-21

Continuing along Produce Avenue, the route will encounter previously installed sub-grade improvements which will require replacement. Crossing under Colma Creek will probably require closure of Produce Avenue due to the size of the necessary bore pits and will disrupt the southbound Freeway 101 off-ramp to Produce Avenue and South Airport Boulevard. The heavy traffic in this area will be severely disrupted by construction.

H-22

Crossing under Freeway 101 on South Airport Boulevard, the route will encounter two sewer force mains. This undercrossing is a major route to businesses east of Freeway 101, and construction will create a major disruption.

From the freeway undercrossing, the route turns north along Gateway Boulevard. Halfway to East Grand Avenue, railroad tracks must be crossed. A 24-hour major truck fueling facility, restaurant, and other businesses line the street. Fiber optic lines have been installed in this section of Gateway Boulevard.

After crossing East Grand Avenue, one of the two major access routes to businesses East of 101, Gateway is lined with South San Francisco's premier hotels and office buildings. This area is mischaracterized as "industrial" in the DEIR. The statement to that effect on page D.2-50 is simply incorrect. Given the past land uses in this area, it is virtually certain that contamination by toxic materials exists under the street. Construction will require characterization of these toxics and use remediation measures of unknown complexity. Again, the DEIR has not adequately considered how this contamination will be addressed during construction. Fiber optic cables also underlie the street.

This same segment of Gateway Boulevard also contains an existing, 300 position child care center at 850 Gateway Boulevard. In addition, the City of South San Francisco has just broken ground on a new, 100 position child care center at 559 Gateway, which will

Comment Set H, cont.

H-22

be in operation by the time the Jefferson-Martin project begins construction. Child care facilities, of course, house our society's most sensitive receptors. Major mitigation and protective measures will be required to protect these sensitive receptors from exposure to toxics that will be disturbed if this route is constructed. The DEIR does not acknowledge the existence of these sensitive receptors or identify any mitigation measures (if any exist) that will address the impacts on these adjacent child care centers.

Gateway Boulevard stubs into Oyster Point Boulevard at the new terminus of a new, nearly completed flyover off-ramp from southbound Freeway 101 to eastbound Oyster Point Boulevard. This intersection carries some 20,000 vehicles per day, a number which may well increase when the flyover is completed. Once across Oyster Point Boulevard, the route enters the area known as Bay West Cove.

The proposed route turns west toward Freeway 101 after crossing Oyster Point Boulevard. This area is a classic brownfield, with significant known toxic contamination which has been concentrated and capped. The proposed route will traverse some of the most toxic areas in the City, breaching the cap and excavating with known contaminated areas in the process. Yet again, the DEIR does not adequately address how this contamination will be addressed during construction. The section of Bay West Cove proposed to be traversed by the proposed route is currently undeveloped, but approvals have been granted to construct office and biotech buildings and a 350 room hotel. Construction of these facilities can begin any time the owners feel that conditions warrant. The approvals granted for the Bay West Cove properties are for buildings which minimize disturbance of the cap and the known contamination. This area is generally upwind of the 300 position child care facility at 850 Gateway Boulevard, which, as already noted, contains extremely sensitive receptors. However, the sensitive receptors are not the only receptors; indeed, brownfield remediation is generally conducted with the idea that the toxics, once capped, will remain undisturbed in place. Breaching of the cap may require its restoration to more stringent, contemporary standards. The DEIR does not acknowledge this significant challenge.

Still in the Bay West Cove area, the route turns north near the railroad tracks (still in the contaminated soils) and continues along in front of two new hotels. Aside from the toxics issues, there is little room to maneuver. Maintaining access for patrons and for emergency vehicles will be a significant problem, as will protection of hotel patrons from toxics. The DEIR does not discuss how impacts on these adjacent visitor-serving uses will be mitigated.

Past the hotels, going north, San Francisco Bay is located almost at the railroad right-of-way. The route in this area is within the jurisdiction of the Bay Conservation and Development Commission, and may have potential to disturb shellmounds and affect threatened or endangered species.

Continuing north, the route moves into the Sierra Point office park area, which is an old landfill. Excavation in this area will require evaluation of the excavated materials and

Comment Set H, cont.

restoration of the landfill cap and proper protection of office workers from potential toxics.

H-22

From this area, the route passes out of the jurisdiction of South San Francisco.

Regardless of the route selected, any construction must be handled in a manner that preserves the ability of emergency vehicles to respond as necessary to emergency conditions. It is quite clear that maintaining this ability without adverse impacts will be far easier with the project description route rather than the "Environmentally Superior Alternative" route.

H-23

The route defined in the project description clearly would generate far fewer impacts on the City of South San Francisco. A detailed and objective analysis of the problems created by construction of the "Environmentally Superior Alternative" must lead to the conclusion that the project as originally defined will be far less disruptive to businesses and residents attempting to access employment areas east of 101 and will not generate the host of toxics problems and potential exposure of sensitive receptors sure to arise with the "Environmentally Superior Alternative." All in all, we submit that the "Environmentally Superior Alternative" is in fact no such thing and should be removed from further consideration. Further, the statement on Page ES-29 that the Modifies Existing 230 kV Alternative "will result in similar construction-related impacts to those identified for the Proposed Project and will result in an overall reduced degree of disturbance" must be removed as simply not reflecting the reality of the significant impacts that would result from construction along this route. In fact the DEIR acknowledges as much on page D.10-17 when it states that this alternative would only "somewhat decrease the number of residences and schools that would be near the work."

H-24

Route Modification Proposed by DEIR preparers:

The City received on August 27, 2003 a letter to Mr. Wesley Snow which in part suggests a modification to the route of the "Environmentally Sensitive Alternative." This route would cross under Highway 101 and the Colma Creek tributary in a single bore. The western terminus of the bore would be just north of Shaw Road in the parking lot of the business that backs up to the Colma Creek tributary. The eastern terminus of the bore would be in the vicinity of the cul-de-sac of Marco Way, off South Airport Boulevard.

H-25

This option would relieve some of the issues involved with closure of the Produce Avenue on-ramp and disruption of the Golden Gate Produce Terminal. Businesses along Marco Way and South Airport Boulevard would be affected. The route passes near two gasoline stations. The same flood issues pertain as on the west side of Highway 101. Marco Way and the much of the South Airport Boulevard section of the proposed modified route are within the Flood Insurance Rate Map "Zone B." Further, in addition to the usual underground utilities, there is a large, high pressure gas main under South Airport Boulevard.

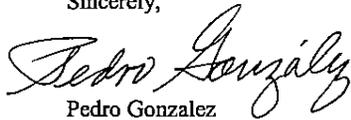
Comment Set H, cont.

Proposal for an alternative that actually is Environmentally Superior:

Within South San Francisco, the intuitively and rationally obvious route to pursue is along the railroad tracks. Such a route is short, direct, generally away from residences, and devoid of the serious issues generated by the “Environmentally Sensitive Alternative” and indeed, by the project as generally proposed. The DEIR is devoid of any discussion regarding this feasible alternative route. The railroad right-of-way should be carefully investigated as a possibility that minimizes environmental impacts of the project.

Thank you for the opportunity to comment.

Sincerely,



Pedro Gonzalez
Mayor

H-26

Responses to Comment Set H – City of South San Francisco

- H-1 The City’s support for the Proposed Project route along the BART ROW is acknowledged. The environmental analysis in Section D.8, Public Health and Safety, of the Draft EIR supports the stated conclusion that impacts from hazardous materials and toxic contamination would be less along the proposed route than along the Modified Existing Underground 230 kV Alternative route, and even with more detailed consideration of the contaminated sites along the alternative route, impacts of both routes would be less than significant with mitigation. All impacts of both the Proposed Project’s underground segment and the Modified Existing Underground 230 kV Alternative are found to be less than significant. As a result of comments on the Draft EIR and additional analysis completed, this Final EIR concludes that the both underground routes are comparable. Therefore, while the impacts affect different environmental issue areas, all impacts would be less than significant and are considered to be comparable. As a result, the Final EIR identifies both the Proposed Project’s underground segment and the Modified Existing Underground Alternative as environmentally superior to the other northern segment alternatives.
- H-2 The Draft EIR presented a legally and technically adequate analysis of the Modified Existing Underground 230 kV Alternative. In this analysis, impacts were identified and mitigation measures were recommended to ensure that impacts would be minimized. The impacts that the City is concerned about are short-term construction impacts, for which mitigation ensures that impacts would be less than significant. Regardless, the analysis of this alternative has been expanded in the Final EIR (see Responses to Comments H-3 through H-17). In addition, six route modifications are considered in this Final EIR that would substantially reduce short-term conflicts during project construction. Those modifications are illustrated on Figures Ap.1-12a and 1-12b, and analysis of these route options has been added to Sections D.2 through D.14 of the Final EIR, where appropriate.
- H-3 This comment refers to poor quality soils along Shaw Road and relates to Section D.6.5.6 - Modified Existing 230 kV Underground ROW, Environmental Setting subsection. This condition is recognized in the last paragraph of the above-named subsection: “As most of the rest of the route lies within already-disturbed street and urban corridors, the local soil conditions would be highly variable and dependent on past activities.” Site-specific soil conditions along Shaw Road will be characterized by the geotechnical investigations required in Mitigation Measure G-6a which addresses the potential for hazards caused by liquefaction, lateral spreading, and ground-cracking. Mitigation Measure G-1a, which requires completion of geotechnical studies will also be required for this alternative to further address concerns with poor soil quality along Shaw Road.
- Pursuant to Mitigation Measure U-1b (Protection of Underground Utilities) in Section D.14, Public Services and Utilities, prior to the commencement of construction, PG&E must provide the appropriate jurisdictions the opportunity to review and approve the finalized transmission line alignment, including construction plans designed to protect existing utilities. Also, refer to the Response to Comment B-11, above.
- H-4 Pursuant to Mitigation Measure U-1b (Protection of Underground Utilities) in Section D.14, Public Services and Utilities, prior to the commencement of construction, PG&E must provide

the appropriate jurisdictions the opportunity to review and approve the finalized transmission line alignment, including construction plans designed to protect existing utilities.

The Modified Existing 230 kV Underground ROW Alternative route would be completely underground. Therefore, there would be no encroachment into a floodplain by above-ground features that could result in damage to above-ground structures, diversion of flows and increased flood risk for adjacent property, or increased erosion on adjacent properties.

- H-5 The bore pit south of the Colma Creek tributary would be located in the northeastern corner of a business parking lot. Therefore, access along Shaw Road would not be affected by boring operations. Pursuant to Mitigation Measure L-7b (requiring coordination with businesses), PG&E would be required to either make prior arrangements with the business parking lot owner to provide alternative parking within reasonable walking distance, or would be required to coordinate the construction schedule to prevent disrupting the functions of the business.
- H-6 Six optional segments for the Modified Existing 230 kV Alternative route have been identified based on Responses to Comments on the Draft EIR. As illustrated in Figure Ap.1-12b, Route Option A would avoid construction-related impacts along Produce Avenue and South Airport Boulevard. The entrance bore pit would remain in the business parking lot south of the Colma Creek tributary; however, the bore would proceed to the northeast to Marco Way under the freeway and the Colma Creek tributary. From Marco Way, the line would continue northeast to South Airport Boulevard where it would turn north-northwest. On South Airport Boulevard the line would continue north-northwest then north to Gateway Boulevard where it would meet the Modified Existing 230 kV Alternative route presented in the Draft EIR. Refer to Final EIR Section 4.3.4 for a detailed description of the optional route segments associated with the Modified Existing 230 kV Alternative.
- H-7 Please see Response to Comment H-6, above.
- H-8 Please see Response to Comment H-6, above.
- H-9 Please see Response to Comment H-6, above.
- H-10 All active railroad crossings would be bored to ensure no adverse impacts to the railroad system. Also, please see Responses to Comments H-11 and H-4.
- H-11 The land use description and Table D.2-16 for the Modified Existing 230 kV Alternative have been revised based on the information provided, and field verification to acknowledge the presence of office buildings and hotels along Gateway Boulevard.

Regarding the anticipated presence of hazardous soils during construction, substantial additional information has been added to the EIR in Section D.8 to describe the Homart Site along Gateway Boulevard between East Grand Avenue and Oyster Point Boulevard. The former land occupied by Bethlehem Steel and Edwards Wire and Rope companies was acquired by Homart Development Corporation (Draft EIR, Table D.8-12, Site 35-36) in 1980 and has a history of more than 20-years of remediation of soil containing metals (Pb, Zn, Ni, Cr), petroleum hydrocarbons and PCBs, and acidic groundwater. Remediation has included removal of surface structures and waste, removal and disposal of contaminated soil, consolidation of contaminated soil into only two areas, and construction of a soil cap. Groundwater pH returned to neutral within several months after construction of the soil cap. Documentation of this remediated site

includes construction procedures for safe installation of utilities within the roadway. It is noted that Gateway Boulevard has existing utility substructure already installed (water, sewer, and fiber optic lines), so clearly construction can be safely completed. In addition to the deed restrictions that govern construction within the Homart Site area, the EIR recommends implementation of Mitigation Measures HAZ-2a, HAZ-3a, and HAZ-3b, and Applicant Proposed Mitigation Measures 11.1 and 11.4. These measures, presented in Section D.8 of the EIR, would require contamination investigations, training, sampling, characterization, and removal and would be required of PG&E prior to and during construction activities. Also, refer to Response to Comment H-4, above.

H-12 Table D.2-16 has been updated to include reference to the childcare centers. Both of these centers would be located along the segment of Gateway Boulevard in which the transmission line would be installed. Construction procedures defined for the Homart Site specifically state that construction in this area can safely occur if recommended procedures are followed. To further minimize impacts on these sensitive receptors, three types of mitigation would be implemented:

- Implementation of mitigation measures defined in Response to Comment H-11 would protect nearby residents or occupants from exposure to hazardous materials discovered during construction.
- Implementation of mitigation measures in land use (Section D.2) would minimize general construction disturbance to sensitive land uses.
- Implementation of PG&E's EMF Field Management Plan (as revised for the approved route) would result in reduction of magnetic fields at schools and day care centers as the first priority of all land uses. Given the width of Gateway Boulevard (approximately 90 feet) and the setback of the developed properties along this roadway (generally about 100 feet), the magnetic fields at the day care centers would be less than 0.1 mG.

H-13 Once a project route is selected, PG&E would be required to work with affected jurisdictions, including South San Francisco if appropriate, on the final design of the project that would be built within public road ROWs through each jurisdiction's permit process. To ensure that crossings of high traffic volume roadways (e.g., Oyster Point Boulevard) are not too disruptive to local traffic patterns, the sentence has been added to Mitigation Measure T-1b: PG&E shall implement bored crossings or nighttime construction if the appropriate jurisdiction determines that trenched roadway crossings would be too disruptive to local traffic patterns.

H-14 The description of the route of the Modified Existing 230kV Underground ROW Alternative has been expanded to describe the Chiltern Brownfield area on the north side of Oyster Point Boulevard. This site was originally used for metal manufacturing and processing. Chiltern Development Corporation acquired the former US Steel Shearwater Project (Draft EIR, Table D.8-12, Site 33). This facility was under the oversight of the Regional Water Quality Control Board in 1982 for site investigation and cleanup strategy of heavy metals, asbestos containing materials, and organic liquids with metals. Route Option E (as illustrated in Figure Ap.1-12a) is recommended in this Final EIR, in which the transmission line route would be along Veterans Boulevard, eliminating construction through the vacant lot north of Oyster Point Boulevard and avoiding the potential for construction to encounter any hazardous materials still within this site.

- H-15 The final route in this area west of the hotels could be either within the parking area or west of the parking area in the landscaped strip adjacent to the railroad ROW. Construction in the landscaped strip would minimize impacts on hotel traffic. However, note also that Mitigation Measure L-7c (Provide Continuous Access to Hotels) has been added to Section D.2.5.6 to minimize impacts on hotel business.

In addition, please see Responses to Comment Set J and Section 4.3.11 in Appendix 1 for a discussion of use of the Caltrain railroad corridor ROW.

- H-16 The Bay Conservation and Development Commission (BCDC) jurisdiction includes the San Francisco Bay and areas within 100 feet inland of the Bay. The route of the Modified Existing Underground 230 kV Collocation Alternative would pass within their jurisdiction in the area of Oyster Cove in South San Francisco and would thus require a permit (BCDC, 2003²). To receive a permit, maximum feasible public access would be required. The potential to affect shellmounds, within this area and all areas of the Proposed Project and alternatives, is discussed in Section D.5 (Cultural Resources) and Mitigation Measures C-1b (Cultural Resources Treatment Plan) and C-1c (Construction Monitor) would reduce potentially significant impacts to less than significant levels. Threatened and endangered species and associated habitats are addressed in Section D.4 (Biological Resources), and appropriate construction and restoration practices are included in the mitigation measures intended to reduce potentially significant impacts to biological resources to less than significant levels.

- H-17 The Sierra Point Landfill (Sierra Point Disposal Site or Brisbane Dump Site) was included in EIR Table D.8-12, as Sites 22-23, but substantial additional text has been added to the text of Section D.8. This is a closed and capped landfill located east of Highway 101 both north and south of the South San Francisco/Brisbane City boundary. The property was acquired and developed by the Sierra Point Development Company; the entire site is now developed. Based on discussion with the San Mateo County landfill inspector and the engineers that designed the Sierra Point development, installation of an underground transmission line through the closed landfill is technically feasible, and would be permitted if appropriate engineering measures are implemented. Up to 1,600 feet of the route may require construction below the level of the landfill cap; however, engineering techniques are available to ensure that the integrity of the cap would be maintained even after transmission line construction. There are a variety of existing utilities currently installed underground both above and within the capped areas. Recommended mitigation would ensure safe construction and the continued integrity of the cap.

- H-18 As illustrated in EIR Table E-7 (Section E, Comparison of Alternatives), the Proposed Project's underground segment would have greater impacts in several issue areas and the alternative would have greater impacts in other issue areas. Other issue areas show no difference. No significant unmitigable (Class I) impacts have been identified for either the proposed route segment or the Modified Underground Alternative. As a result, the Final EIR designates both the Proposed Project's underground segment and the Modified Underground 230 kV Collocation Alternative as environmentally superior.

A comprehensive set of mitigation measures is proposed in the EIR to minimize construction impacts, including several specifically intended to minimize impacts along the Modified

² BCDC. 2003. Personal communication of Jeff Blanchfield, BCDC, with H. Born, Aspen Environmental Group. September 16.

Underground route. These measures are defined in Sections D.2 (Land Use), D.8 (Public Health and Safety), D.10 (Air Quality), D.11 (Noise and Vibration), and D.12 (Traffic and Transportation).

The Modified Underground Alternative would allow avoidance of: (a) a densely populated residential area in Daly City where construction would occur in approximately one mile of residential streets (Hillside Boulevard, Hoffman Street, and Orange Streets); (b) six large schools that are immediately adjacent to the proposed route and other sensitive land uses; and (c) construction over San Bruno Mountain, a State and County park recognized for its unique and valuable habitat. In addition, the Modified Underground Alternative is approximately four miles shorter than the 12.4-mile underground segment of the proposed route, a 30% reduction in regional construction impacts. Therefore, it offers clear environmental advantages over the Proposed Project route in certain environmental disciplines.

In comparison, the Proposed Project's underground route would have fewer impacts to cultural resources and less potential to affect water quality in the San Francisco Bay (due to the greater distance of the proposed route to the Bay). It would avoid construction through or near the contaminated areas along the historically industrial areas of South San Francisco east of Highway 101 and through the Sierra Point Landfill, and the Proposed Project would have less construction effects on businesses and hotels in South San Francisco.

- H-19 Please see Responses to Comment Set J for a discussion of use of the Caltrain railroad corridor ROW and Section 4.3.11 in Appendix 1, which evaluates the Caltrain ROW Alternative, as a new alternative added in response to comments made during the comment period on the Draft EIR. This alternative was not evaluated in the EIR because it would not meet two important project objectives and it poses significant technical feasibility challenges.
- H-20 Please see Responses to Comments H-1 through H-8.
- H-21 The location of this area within flood insurance Zone B would not be expected to affect the safety of the project if it is properly constructed, as it would be buried below roadways. Zone B is the area between the 100-year and 500-year floodplains. Infrequent flooding over the surface of the roads would not affect the operation of the transmission line.
- H-22 Please see Responses to Comments H-9 through H-17.
- H-23 Impact T-6 (Construction Interference with Emergency Response) in Section D.12.3.5 (Transportation and Traffic), 230 kV Underground Transmission Line, addresses the importance of maintaining emergency access during construction. Mitigation Measure T-6a (Ensure Emergency Response Access) requires that PG&E coordinate with local jurisdictions and develop provisions to accommodate emergency vehicles.
- H-24 Please see Responses to Comments H-14 and H-18. The statement in Section D.10 (Air Quality) (Draft EIR page D.10-17) has been corrected to replace the word "somewhat," with the word "substantially" because as explained in Response to Comment H-18, there is a substantial difference between the sensitive land uses along the proposed route segment and the commercial and industrial land uses along the Modified Underground Existing Alternative. However, as also noted in Responses to Comments H-1 and H-18, the revised analysis in this Final EIR shows that the Proposed Project and the Modified Underground Alternative would have comparable levels of impacts, but in different environmental issue areas. As a result, both

routes are found to be environmentally superior to other northern segment alternatives considered in this EIR.

- H-25 The City's comment acknowledges that the route modification (indicated on Figure Ap.1-12b as "Route Option A") would eliminate impacts along Produce Avenue. Short-term construction effects on businesses along Marco Way and South Airport Boulevard would be mitigated to less than significant levels (Class III) by mitigation proposed in Sections D.2 (Land Use), D.10 (Air Quality), D.12 (Transportation and Traffic), and other sections of the EIR. Existing utilities within those roadways would be identified and avoided, in compliance with Mitigation Measure U-1b (Protection of Underground Utilities). Also, mitigation measures in Section D.8 (Public Health and Safety) would ensure that adequate investigation would be pursued, and that appropriate protective actions would be taken for construction through areas with known existing contamination.
- H-26 Please see Response to Comment H-19.